

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

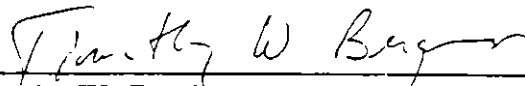
POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**THE McGRAW-HILL COMPANIES' INITIAL  
INTERROGATORIES AND OTHER DISCOVERY REQUESTS  
DIRECTED TO USPS WITNESS BRADLEY (MH/USPS-T13-1-3)**

Pursuant to the Commission's rules of practice, sections 25-27, The McGraw-Hill Companies, Inc. submits the following interrogatories and other discovery requests to United States Postal Service witness Michael D. Bradley (T-13).

Respectfully submitted,

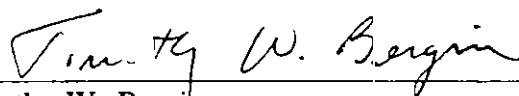


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Counsel for The McGraw-Hill  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document in accordance with Section 12 of the rules of practice.



Timothy W. Bergin

September 17, 1997

**MH/USPS-T13-1.** Please explain fully your understanding of the reasons why the Postal Service, with its economies of scale, has been unable to negotiate purchased transportation contracts that are competitive with the purchased transportation contracts negotiated by mailers who dropship (bypassing some or all transportation provided by the Postal Service). Do the reasons include the Postal Service's reliance on rigid, four-year highway transportation contracts that are not negotiated, and/or the Postal Service's inadequate projections of volumes in the process of entering into transportation contracts?

**MH/USPS-T13-2.** With reference to your testimony at page 9, line 18, through p. 10, please confirm that dropshipping does not necessarily drive substantial transportation costs out of the Postal Service network (with possible exceptions such as plant-load costs). To the extent you do not confirm, please explain your answer fully.

**MH/USPS-T13-3.** Please explain whether or not you estimate the same volume variability of Postal Service transportation costs for Periodicals Regular mail as for other mail subclasses. To the extent that you do make such an estimate, please explain whether or not you believe that Periodicals mail is likely to be transported by the same vehicles, in the same proportion, as all other classes of mail, and explain the basis for any such belief.